

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Joint Application of)
Westar Energy, Inc. and Kansas Gas and)
Electric Company for Approval to Make) Docket No. 18-WSEE-328-RTS
Certain Changes in their Charges for)
Electric Services.)

PETITION TO INTERVENE OF
THE GOODYEAR TIRE & RUBBER COMPANY

The Goodyear Tire & Rubber Company (“Goodyear”) respectfully files this Petition to Intervene in the above-referenced case, pursuant to K.A.R. 82-1-225. In support of its Petition, Goodyear states to the State Corporation Commission of the State of Kansas (“KCC” or “Commission”) as follows:

1. On February 1, 2018, Westar Energy, Inc., and Kansas Gas and Electric Company (collectively referred to as "Westar") filed a Joint Application requesting authorization to make certain changes to its charges for electric service in Kansas.

2. Goodyear’s Topeka facilities are among the largest manufacturing operations in the state of Kansas. Goodyear employs several hundred people in Kansas and creates substantial economic activity in and around Topeka and Shawnee County, Kansas. Goodyear is one of Westar’s largest direct retail electric customers. The cost of retail electric energy and the terms and conditions for retail electric service are of major importance to the business operations of Goodyear. The matters to be considered by the Commission in this proceeding may affect Westar’s retail electric rates and the terms and conditions of electric service to Goodyear. Therefore, Goodyear has a substantial, direct financial interest in all the cost of service, rate design, tariff, and policy issues that may be addressed, considered, and determined by the Commission in this Docket.

3. Goodyear agrees to accept the state of this Docket in all respects at the time of its Petition and requested intervention herein.

4. No party to this proceeding adequately represents the interests of Goodyear. However, Goodyear intends to participate, as appropriate, through the Kansas Industrial Consumers Group, Inc. (KIC). KIC filed a Petition to Intervene in this Docket on February 19, 2018, which was not yet been granted.

5. Goodyear respectfully requests the right to intervene without limitation in this matter and to fully participate in all aspects of this Docket, including but not limited to the rights to serve relevant discovery, present witness testimony and other evidence, file briefs, motions, and other documents, as appropriate, and fully participating in any Commission hearings.

WHEREFORE, Goodyear respectfully requests the Commission grant its Petition to Intervene in this matter. Goodyear also requests all other relief to which the Commission determines it may be entitled.

Respectfully submitted,

/s/ **Andrew J. French**

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**Attorneys for Goodyear Tire & Rubber
Company**

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF JOHNSON)

Andrew J. French, being duly sworn upon his oath, deposes and states that he is the Attorney for the Kansas Industrial Consumers Group, Inc., that he has read and is familiar with the foregoing *Petition to Intervene of Goodyear Tire & Rubber Company*, and the statements therein are true to the best of his knowledge, information, and belief.



Andrew J. French

SUBSCRIBED AND SWORN to before me this 7th day of March, 2018.



Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or regular U.S. mail (unless otherwise noted), the 7th day of March, 2018, to the parties below:

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/s/ **Andrew J. French**
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